

EXHIBIT A

INSTRUCTIONS

A. The singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun, and vice versa. The masculine form of a noun or pronoun shall be considered to include within its meaning the feminine form of the noun or pronoun, and vice versa.

B. Any defined term with or without capitalization or quotation marks used herein shall be regarded as a defined term for purposes of Exhibit A.

C. Each of the requests in Exhibit A is for Documents in Your possession, custody or control whether or not prepared, authored, or executed by You.

D. Each Document is to be produced as it is kept in the usual course of business and shall be organized and labeled to correspond with each paragraph in Exhibit A, below.

E. Do not produce privileged Documents. Instead, if any Documents are withheld under a claim of privilege, furnish a list describing each document for which privilege is claimed, together with the following information:

1. Author and job title;
2. Name and job title of each recipient and person to whom a copy was furnished;
3. Date of the Document;
4. Basis on which privilege is claimed; and
5. The specific request under Exhibit A to which each such document is responsive.

F. If any Document has been destroyed, discarded, or is otherwise no longer in existence please state:

1. Author;
2. Date of the Document;
3. Subject matter of the Document;
4. The date it was destroyed, discarded, or discovered to no longer to be in existence; and
5. The reason it was destroyed, discarded, or is no longer in existence.

G. You should supplement or amend your responses to these requests if additional Documents covered hereby are obtained or discovered.

H. Regardless of the tense employed, all verbs shall be read as applying to the past, present and future as is necessary to make any paragraph more, rather than less, inclusive.

DEFINITIONS

“And” as well as **“or”** as used herein are terms of inclusion and not of exclusion, and shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request for production of documents any document or information that might otherwise be construed to be outside its scope.

“Any” means one or more.

“Communication” is defined to include any transmission of information from one Person, or group of Persons, to any other Person, or group of Persons, regardless of the medium or means by which such transmission occurred, including, but not limited to, oral, written, face-to-face, telephone, facsimile, electronic mail, postal mail, personal delivery, or otherwise. When in the form of a Document or thing, **“Communication”** is defined to include any attachments thereto. **“Communication”** that is “electronically stored information” shall be produced so as to preserve the integrity of the electronic document’s contents, i.e., the original formatting of the document, its metadata and, where applicable, its revision history.

“Concerning” or **“concern”** shall mean in whole or in part, directly or indirectly, referring to, relating to, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, concerning, constituting, embodying and/or mentioning.

“Debtor” means and refers to Michael W. Kent, the debtor in Chapter 7 Case No. 13-23288.

“Describe,” “discuss,” “analyze,” “describing,” “discussion,” or **“analyzing,”** mean any document that, in whole or in part, characterizes, delineates, explicates, deliberates, evaluates, appraises, assesses or provides a general explanation of the specified subject.

“Document” or “Documents” means and is intended to have the broadest possible meaning and includes, without limitation, any writings, electronic transmissions, email, drawings, graphs, charts, photographs, recorded, digitally encoded, graphic, and/or other data compilations from which information can be obtained, translated if necessary through detection devices into reasonably usable form, or other information, including originals, copies (if the original is no longer available), translations and drafts thereof and all copies bearing notations and marks not found on the original. The term **“Document” or “Documents”** includes without limitation, account statements, affidavits, analyses, appraisals, confirmations, contracts, correspondence, Communications, deeds of trust, diskettes, drafts, estimates, evaluations, filings, financial statements, forms, journals, ledgers, letters, lists, memoranda, minutes, notations, notes, opinions, orders, pamphlets, papers, employees’ review checklists, permanent files, pictures, press releases, projections, prospectuses, publications, receipts, recordings of conferences, conversations or meetings, reports, statements, statistical records, studies, summaries, tabulations, telegrams, telephone records, telex messages, transcripts, understandings, videotapes, vouchers, work papers, copies of records and documents, and sheet or things similar to any of the foregoing however denominated. The term **“Document” or “Documents”** further means any document now or at any time in the possession, custody, or control of the entity to

whom this document request is directed (together with any predecessors, successors, affiliates, subsidiaries or divisions thereof, and their officers, directors, employees, agents and attorneys). Without limiting the term “control” as used in the preceding sentence, a person is deemed to be in control of a document if the person has a right to secure the document or a copy thereof.

“Identify” is defined to include naming, revealing the identity of, describing, suggesting the identity of, or otherwise aiding or assisting in the location, specification, particularization, sorting, or other identification process.

“Indicating”, “indicates”, or “indicate” are each defined to include showing, specifying, revealing, or otherwise demonstrating, whether alone or in combination with other Documents and things.

“Person” means any natural person, corporation, partnership, company, sole proprietorship, association, institute, joint venture, firm, governmental body, or other legal entity, whether privately or publicly owned or controlled, for profit or not-for-profit, or partially or fully government owned or controlled.

“Petition Date” means March 27, 2013, the date on which Michael W. Kent filed chapter 7 bankruptcy case no. 13-23288.

“Relate to” and **“relating to”** mean to make a statement about, refer to, discuss, describe, reflect, contain, comprise, identify, or in any way to pertain to, in whole or in part, or otherwise to be used, considered, or reviewed in any way in connection with, the specified subject. Thus, documents that “relate to” a subject also include those which were specifically rejected and those which were not relied or acted upon.

“You” or **“Your”** mean Michael W. Kent the Debtor in chapter 7 bankruptcy case no. 13-23288.

“Year” means calendar year.

DOCUMENTS REQUESTED

1. Copies of all account statements for the eighteen (18) months preceding the Petition Date for the Patriot Bank account with an account number ending in 4143, including statements (even if received post-petition) that reflect activity in the month in which the petition was filed; along with sufficient documentation to explain the source of every deposit or credit, and the purpose of every check, withdrawal, or debit.

2. Copies of all account statements for the eighteen (18) months preceding the Petition Date for the account to which the Debtor has access with an account number ending in 3945, including statements (even if received post-petition) that reflect activity in the month in which the petition was filed; along with sufficient documentation to explain the source of every deposit or credit, and the purpose of every check, withdrawal, or debit.

3. Copies of all account statements for the eighteen (18) months preceding the Petition Date for any other personal banking, depository, and investment accounts in which the Debtor had an interest in or access to in any of the eighteen (18) full calendar months prior to the Petition Date, including statements (even if received post-petition) that reflect activity in the month in which the petition was filed; along with sufficient documentation to explain the source of every deposit or credit, and the purpose of every check, withdrawal, or debit. (Include information for checking, savings, money market, mutual fund, and brokerage accounts. Examples of documentation for deposit and withdrawal transactions include canceled or imaged checks, check registers, and annotations on or attached to the account statements.)